

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**EDGAR REYNA,**

Plaintiff,

v.

**EPIROC DRILLING SOLUTIONS,  
LLC.,**

Defendant.

**Civ. Action No. 3:23-cv-01005-X**

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**APPENDIX OF EVIDENCE IN SUPPORT OF PLAINTIFF'S OPPOSITION  
TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

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Pursuant to Local Rules 7.1(i) and 56.6(b), Plaintiff submits the foregoing Appendix of Evidence in Support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment. Plaintiff's Opposition relies upon, and requests the Court take judicial notice of the foregoing evidence.

<b>Exhibit Id.</b>	<b>Description</b>	<b>Appx. Start</b>	<b>Appx. End</b>
A	Reyna Deposition Transcript	1	325
B	Gudgel Deposition Transcript	326	368
C	Chung Deposition Transcript	369	408
D	Buttacavoli Deposition Transcript	409	462
E	Tyson Deposition Transcript	463	525

F	Witness Statements	526	537
G	EEOC Charges	538	547
H	Complaints made to HR	548	574
I	Complaint made to Corporate	575	577
J	Def's MSJ	578	633
K	Offer Letter	634	634
L	Ex. 13 of Gudgel's Dep. - Epiroc 559-560, Native format	635	636
M	Ex. 14 Gugdel's Dep. – Epiroc 559	637	637
N	Reyna 01-24-2022 Note	638	638
O	EEOC Rebuttal	639	643
P	J. Gudgel email sent to himself dated 06-03-2022- Epiroc 573	644	644
Q	J. Gudgel email to A. Tyson - Epiroc 614	645	645
R	Pltf's Amended Complaint	646	661
S	G. Casarez email to M. Buttacavoli, dated 11-01-2022, - Epiroc 473	662	662
T	P.Chung email to T.Tyler and M. Buttacavoli, dated 04-23-2022 - Epiroc 300	663	663
U	Peter Chung Statement - Epiroc 536-537	664	665
V	HR email to E. Reyna re: returning to work, Epiroc 486-487	666	667
W	EO and Anti- Harassment Policy	668	673
X	Acknowledgement receipt – Anti- Harassment Policy	674	674
Y	Email re: Training, dated 2-26-2019	675	675
Z	E.Reyna 000177 – Audio file	676	676
AA	E. Reyna 000179 – Audio file	677	677
BB	E. Reyna 000180 – Audio file	678	678
CC	E. Reyna 000201 – Audio file	679	679
DD	E. Reyna 000184 - Audio file	680	680
EE	E. Reyna 000185 - Audio file	681	681

FF	Edgar Reyna Declaration		
GG	Lisa Ventress Declaration		

Respectfully Submitted

By:/s/ Lisa Ventress

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

On August 29, 2024, a true and correct copy of the foregoing document was served via the court's e-filing system, on all counsel of record, including:

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